ORIGINAL

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

DOMINION CITRUS, LTD. Ontario Food Terminal 165 The Queensway Room 304

Etobicoke Ontario M8Y 1H8

and

FRESH FRUIT S.A.

Parcelle No 4 1 er Etage

Nouveau Port Anza

Agadir, Morocco

and

AGRI SOUSS

P/C Fresh Fruit S.A.

Parcelle No 4 1 er Etage

Nouveau Port Anza

Agadir, Morocco

and

EL BOURA

P/C Fresh Fruit S.A.

Parcelle No 4 1 er Etage

Nouveau Port Anza

Agadir, Morocco

and

GPA

P/C Fresh Fruit S.A.

Parcelle No 4 1 er Etage

Nouveau Port Anza

Agadir, Morocco

and

LIMONA SOUSS

P/C Fresh Fruit S.A.

Parcelle No 4 1 er Etage

Nouveau Port Anza

Agadir, Morocco

and

PRIAGRUS

P/C Fresh Fruit S.A.

Parcelle No 4 1 er Etage

Nouveau Port Anza

Agadir, Morocco

Plaintiffs

: CIVIL ACTION

M/V BADRINATH. her engines, machinery, tackle, apparel, etc and AMER SHIPPING LTD. 602, Ghinis Building 58-60 Dhigenis Akritas Avenue PO Box 27363, Nicosia 1644 Cyprus and ASHWATER NAVIGATION CO. Ltd. 602, Ghinis Building 58-60 Dhigenis Akritas Avenue PO Box 27363, Nicosia 1644 Cyprus and SEATRADE REEFER CHARTERING N.V. Atlantic House (4th fl.) Noorderlaan 147, PO Box 10.012 2030 Antwerp 3, Belgium and SEATRADE GROUP, INC. Atlantic House (4th fl.) Noorderlaan 147, PO Box 10.012 2030 Antwerp 3, Belgium and SEATRADE USA 442 W. Kennedy Blvd., S. 290 Tampa, FL 33606 USA Defendants.

: NO. 07-cv- **50**

MOTION FOR ORDER AUTHORIZING ISSUANCE OF WARRANT FOR ARREST

Plaintiffs hereby move pursuant to Supplemental Rule C for the issuance of a warrant of arrest of the Defendant Vessel. In support of this Motion, Plaintiffs submit an accompanying Memorandum, a draft Order and a draft Warrant.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion.

Lee C. Goldstein Esq.

By: C. J. Lee C. Goldstein, Esquire
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MATTIONI, LTD.

BY:

DANTE MATTIONI, ESQUIRE STEPHEN J. GALATI, ESQUIRE Attorneys for Plaintiffs,

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Dated: January 26, 2007